

Antidegradation and Permitting Scenarios in Iowa

Antidegradation and NPDES permit amendments and renewals:

Where antidegradation applies:

- Any request for less stringent effective permit limits (e.g., based on new water quality standards, mixing zone study, revised design flows, increased production)
- Any request incorporating new pollutants of concern (POCs) (e.g., new metal finisher treatment agreement, change in chemical additives if there is a new POC)
- Change in outfall location

Where antidegradation does not apply:

- Compliance schedule date adjustments
- Permittee name change
- Change in monitoring requirements
- Increased loadings to a treatment facility that are within the design capacity of that facility (e.g. increased organic loading from an industry) as long as it is a compatible pollutant
- Change in chemical additives, if there are no new POCs
- Newly discovered discharger who does not have a permit
- Where a future permit limit is not effective and may become less stringent based on site specific information

Antidegradation and Construction Permits:

Where antidegradation applies:

- Any increase in design capacity, including ADW or AWW flows, 30-day TSS, 30-day BOD, or 30-day TKN
- Any change in design that will result in less stringent NPDES permit limits

Where antidegradation does not apply:

- Any decrease in design capacity and equally or more stringent NPDES permit limits for any POC
- Unsewered communities
- Combined Sewer Overflow projects, as long as there are no design impacts to the wastewater treatment plant

Iowa DNR Antidegradation Website:

<https://www.iowadnr.gov/Environmental-Protection/Water-Quality/Water-Quality-Standards/Antidegradation>